

**REMARKS**

Applicant respectfully requests reconsideration of this application. Claims 1-28 are pending. No claims have been canceled. No claims have been added. Claims 1, 8, and 17 have been amended.

The Examiner objects to the drawings because reference numeral 402 is not mentioned in the written description. Accordingly, reference numeral 402 has been removed from Figure 4 to overcome the objection. The replacement drawing sheet of Figure 4 is submitted herewith. Withdrawal of the objection is respectfully requested.

Claims 1, 2, and 5-7 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,829,677 of Attaway et al. ("Attaway") in view of the alleged Applicant's Admission of Prior Art ("AAPA"). Applicant respectfully traverses the rejection.

Claim 1 as amended recites:

*causing a first type of reset in a plurality of memory devices* in a system in response to a second type of reset being initiated in the system *if the plurality of memory devices are not initialized*, where the second type of reset is different than the first type of reset;

(Claim 1; emphasis added)

In contrast, neither Attaway nor the alleged AAPA, alone or in combination, teaches the above limitation. However, the Office Action alleged that Attaway teaches causing a reset if the plurality of memory devices are not initialized (Office Action, p. 3). Applicant respectfully disagrees with the Office Action. According to Attaway, a reset of a data processing system is initiated in response to receiving an indication of system reset,

such as a user pushing the reset button on the computer, or the power being turned on to the system (Attaway, col. 7, ln.57-64; Fig. 6, reference numeral 602). In other words, Attaway discloses causing a reset *if an indication of system reset is received*. Attaway does not disclose causing a reset *if the plurality of memory devices are not initialized*. Furthermore, the alleged AAPA also does not disclose causing a first type of reset in a plurality of memory devices in a system in response to a second type of reset being initiated, different than the first type of reset, in the system if the plurality of memory devices are not initialized. Since neither Attaway nor the alleged AAPA discloses the above limitation, claim 1 is patentable over Attaway in view of the alleged AAPA. Withdrawal of the rejection is respectfully requested.

The alleged AAPA and Attaway also fail to render claim 1 obvious under 35 U.S.C. §103(a) because there is no motivation to combine the alleged AAPA with Attaway. The art described by Attaway and AAPA have contrary goals. Attaway is concerned with preserving data in memory during a system reset (Attaway, col. 1, ln. 55-60), while AAPA is concerned with setting the contents of memory to a known state (Specification, paragraph 0003). Thus, a person of ordinary skill in the art would have no motivation to combine Attaway with the alleged AAPA.

Furthermore, the alleged AAPA teaches away from combining its disclosure with Attaway. The alleged AAPA states that “it is problematic to force the memory devices to go through a power cycling sequence as this action by definition is a cold reset, as opposed to the intended warm reset” (Specification, paragraph [0006]). Thus, AAPA teaches away from the use of a cold reset of the memory devices during a warm reset of the system. For at least this reason, the combination of Attaway with the alleged AAPA would not have been obvious to a person of ordinary skill in the art at the time the present

invention was made. As such, claim 1 is patentable over Attaway in view of the alleged AAPA. Withdrawal of the rejection is respectfully requested.

Claims 2 and 5-7 depend directly or indirectly from claim 1. Claims 2 and 5-7 are therefore also patentable over Attaway in view of AAPA for the reasons discussed above with respect to claim 1. Withdrawal of the rejection is respectfully requested.

Claims 3, 4, and 8-28 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,829,677 of Attaway et al. ("Attaway") and the alleged Applicant's Admission of Prior Art (AAPA) and further in view of U.S. Patent No. 6,119,200 of George ("George"). Applicant respectfully traverses the rejection.

Claims 3 and 4 depend from claim 1, and thus, each includes every limitation set forth in claim 1. For the reason discussed above with respect to claim 1, neither Attaway nor the alleged AAPA teaches causing a first type of reset in a plurality of memory devices in a system in response to a second type of reset being initiated, different than the first type of reset, in the system if the plurality of memory devices are not initialized. Moreover, George also fails to disclose the above limitation. George discloses reset control hardware to detect a warm reset, to block a reset signal to the external memory controller, and to place the SDRAM in a self-refresh mode in which the SDRAM refreshes its stored data (George, col. 5, ln.19-28). George does not disclose causing a first type of reset in a plurality of memory devices in a system in response to a second type of reset being initiated, different than the first type of reset, in the system if the plurality of memory devices are not initialized. Since none of Attaway, George, and the alleged AAPA, alone or in combination, discloses all limitation of claims 3 and 4, claims 3 and 4 are patentable over Attaway, George, and the alleged AAPA. Withdrawal of the rejection is respectfully requested.

Claim 8 as amended recites:

a switch to enable a deterministic shutdown mode *when a plurality of memory devices in the system have been initialized*;

(Claim 8 as amended; emphasis added)

The Office Action alleged that Attaway teaches a switch to enable the deterministic shutdown mode when the pluralities of SDRAMs have been initialized. Applicant respectfully disagrees with the Office Action. According to Attaway, a reset of a data processing system is initiated in response to receiving an indication of system reset, such as a user pushing the reset button on the computer, or the power being turned on to the system (Attaway, col. 7, ln.57-64; Fig. 6, reference numeral 602). In other words, Attaway discloses causing a reset *when an indication of system reset is received*. Attaway does not disclose a switch to enable the deterministic shutdown mode *when the pluralities of SDRAMs have been initialized*.

As to George, the reference also fails to teach this limitation. George discloses reset control hardware to detect a warm reset, to block a reset signal to the external memory controller, and to place the SDRAM in a self-refresh mode in which the SDRAM refreshes its stored data (George, col. 5, ln.19-28). George does not disclose a switch to enable a deterministic shutdown mode when a plurality of memory devices in the system have been initialized. Furthermore, the alleged AAPA also does not disclose a switch to enable the deterministic shutdown mode when the pluralities of SDRAMs have been initialized. Since none of Attaway, the alleged AAPA, and George, alone or in combination, teaches the above limitation, claim 8 as amended is patentable over Attaway, the alleged AAPA, and George. Withdrawal of the rejection is respectfully requested.

For the reason discussed above with respect to claim 8, claim 17 is patentable over Attaway, the alleged AAPA, and George. Withdrawal of the rejection is respectfully requested.

Claims 9-16 and 18-28 depend directly or indirectly from claims 8 and 17, respectively. These claims are therefore also patentable over Attaway in view of AAPA, further in view of George, for the reasons discussed above with respect to claims 8 and 17. Withdrawal of the rejection is respectfully requested.

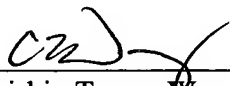
**CONCLUSION**

Applicant respectfully submits that the rejections have been overcome by the remarks, and that the pending claims are in condition for allowance. Accordingly, Applicant respectfully requests the rejections be withdrawn and the pending claims be allowed.

Pursuant to 37 C.F.R. §1.136(a)(3), Applicants hereby request and authorize the U.S. Patent and Trademark Office to (1) treat any concurrent or future reply that requires a petition for extension of time as incorporating a petition for extension of time for the appropriate length of time and (2) charge all required fees, including extension of time fees and fees under 37 C.F.R. §§1.16 and 1.17, to Deposit Account No. 02-2666.

Respectfully submitted,  
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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